FACT SHEET

September 28, 2007

Applicant: City of DeRidder
Wastewater Treatment Plant
200 South Jefferson Street
DeRidder, Louisiana 70643
Atten: Honorable Ron Roberts, Mayor

AI Number: AI 19805
Permit No.: LASS019805
TEMPO ID#: PER20060002

Application Type: Sewage Sludge (Biosolids) Use or Disposal Permit Application
Beauregard Parish

Permit Action:

Sewage Sludge Preparation Process:

Polymer De-watering/Drying Beds

Sewage Sludge (Biosolids) Use or Disposal Option:

Land application of a Class B Biosolids at a site located at 1366 Ball Road, Beauregard Parish and having the following coordinates:

Latitude 30° 46' 56"
Longitude 93° 16' 56"

Sections 21 & 22, Township 3 S, Range 9 W

Pertinent Information:

June 9, 1997: The city of DeRidder was issued a Solid Waste Beneficial Use Permit that is scheduled to expire on June 9, 2007.

December 5, 2006: Booth Environmental Services, LLC submitted a permit application for the Use or Disposal of Sewage Sludge (Biosolids) in Louisiana on behalf of the city of DeRidder.

December 6, 2006: The permit application submitted on December 5, 2006 was deemed "Administratively Complete" by the LDEQ Application Verification Group.

February 8, 2007: A technical review of the permit application submitted on December 5, 2006 was completed and it was determined that additional information was needed in order to draft a permit package.

The following additional information were deemed necessary prior to the drafting of a permit package:

1. The pollutant limits in Table 4 of LAC 33:IX.6903.D are for Biosolids that are bagged and sold or given away. According to the permit application, the Class B Biosolids will be land applied as a bulk material for beneficial use; therefore, for a response to "l." of the **Specific_Facility_Info** section, a selection must be between Tables 1&2 or Tables 1&3 of LAC 33:IX.6903.D.

2. According to the response to "q" of the **Specific_Facility_Info** section, there will be "no" storage of either untreated or treated sewage sludge. However, according to the material provided in Appendix G of the permit application, some form of sewage sludge (untreated and treated) will be stored at the facility. The responses are in contrast with one another; therefore, either the response to "q" of the **Specific_Facility_Info** section needs to be revised or clarification of the different responses must be provided.

3. The schematic provided as Attachment 3 to Appendix F – Specific Facility Information – AD/DB of the permit application indicates that the sewage sludge will be transported to a landfill. However, the permit application is for the land application of Class B Biosolids. Therefore, clarification of this discrepancy must be provided.

4. Unless otherwise noted in the Four (4) Volume Set of the city of DeRidder's O & M, the response provided for O & M in Appendix I of the permit application does not fully address the procedures (including employee safety) for the actual land application of Class B Biosolids. Therefore, provide documentation that fully addresses the procedures for the land application of Class B Biosolids (including employee safety). Sources for the proper procedures for the land application of a Biosolids (including employee safety) can be obtained in the **CDC "Guidance for Controlling Potential Risk to Workers Exposed to Class B Biosolids, July 2002** and other EPA Guidance Documents regarding the land application of Sewage Sludge/Biosolids. These documents can be accessed through the DEQ Biosolids Internet Page at the following Internet address → http://www.deq.louisiana.gov/portal/tabid/2296/Default.aspx .

5. LAC 33:IX.6903.A.2.a.v prohibits the land application of Biosolids when the annual high water table of a soil is at or less than two (2) feet from the surface. Therefore, provide documentation as to how this requirement will be addressed (For example: Either the Biosolids will not be land applied during the months of December through March or some form of ground water monitoring will be supplied at the land application site.).

6. In the information provided for the calculation of "Agronomic Rate", it is indicated that the sewage sludge is "aerobically" digested. However, the response to "o" of the **Specific_Facility_Info** Section indicates that the sewage sludge will only undergo an "Air Drying/Drying Beds" process. Additionally, the schematic provided in Attachment 3 to Appendix F – Specific Facility Information – AD/DB of the permit application indicates that the aerobic process is for the treatment of the sanitary wastewater and that the sewage sludge is not removed and actually treated under a "separate" aerobic digestion process. Rather, the sewage sludge undergoes a polymer de-watering process followed by air drying on drying beds. This being the case, the sewage sludge is basically an "unstabilized" sludge prior to placement on the drying beds. Therefore, any calculations regarding the determination of the proper "Agronomic Rate", including the determination and use of the standard factors that were utilized as part of the formula, must be revisited to insure that they reflect the fact that the sludge is an "unstabilized" sludge.

7. In the "Spreading Rate Determination" of Appendix U of the permit application, it is presented that the Biosolids spreading rate will be the number of pounds dispersed depending on the density of the Biosolids. Therefore, a step-by-step procedure must be provided to illustrate how "density" will be calculated and how the calculated "density" value will be conveyed to the land applier in order to assure that the land applier is capable of determining the proper "gate level" of the Biosolids spreader.

8. For informational purposes and future use: In section 2.0 of Appendix T: Land Application – Agronomic Rate, the EPA guidance document "Process Design Manual for Land Treatment of Municipal Wastewater Effluents" (EPA/625/R-06/016, September 2006) is referenced as a source of information regarding the land application of Biosolids on forest or tree farm soils. This publication is an excellent guidance for the land application of untreated and treated sanitary wastewater; however, as guidance for the treatment of sewage sludge and the resulting land application of Biosolids on forest or tree farm soils, the following references should be utilized:

   "Preparing Sewage Sludge for Land Application or Surface Disposal" (EPA 831/B-93/002a)

   "Land Application of Sewage Sludge – A Guide for Land Appliers on the Requirements of the Federal Standards for the Use or Disposal of Sewage Sludge, 40 CFR 503" (EPA 831/B-93/002b)

   "Process Design Manual – Land Application of Sewage Sludge and Domestic Septage" (EPA/625/R-95/001) (Of particular importance is Chapter 2.3 of this document.)

   "Process Design Manual – Land Application of Municipal Sludge" (EPA 625/1-83-016)

   "Process Design Manual – Sludge Treatment and Disposal (EPA 625/1-79-011) NOTE: This document is presently undergoing a revision by EPA.

February 12, 2007: A letter was drafted and routed for review requesting that the additional information listed in numbers 1- 8 above be submitted to the Department on or before thirty (30) days after receipt of the letter.

March 14, 2007: Booth Environmental Services, LLC submitted the additional information to the Water Permits Division on behalf of the city of DeRidder. The additional information was reviewed and it was determined that in order to address additional concerns, a site visit and meeting was needed.

August 7, 2007: A site visit was conducted to the city of DeRidder Class B Biosolids land application site and subsequent meeting with the City's consultant and representatives. Enough information was obtained from this site visit to proceed with a Draft Permit package.

September 28, 2007: The Draft Permit package was completed and routed for review.

Prepared By: J. Kilren Vidrine
Water Permits Division
Biosolids